



MICHAEL A. CARDIZZO  
*Corporation Counsel*

THE CITY OF NEW YORK  
LAW DEPARTMENT  
100 CHURCH STREET  
NEW YORK, NY 10007

BRIAN FRANCOLLA  
*Senior Counsel*  
Tel.: (212) 788-0988  
Fax: (212) 788-9776

March 6, 2013

**BY ECF**

Honorable James Orenstein  
United States Magistrate Judge  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: Charles Sprowal v. City of New York, et al., 12 CV 4774 (ERK) (JO)

Your Honor:

I am a Senior Counsel in the Special Federal Litigation Division of the New York City Law Department assigned to handle the defense of the above-referenced matter on behalf of defendants. In that capacity, I write jointly with plaintiff's counsel, Gabriel Harvis, Esq., to advise the Court of the status of this case in advance of the status conference scheduled for March 8, 2013, at 10:00 am. The parties respectfully submit that discovery has proceeded in a timely fashion to date. Both parties have exchanged initial disclosures and discovery demands. Further, defendants have responded to plaintiff discovery demands and plaintiff's responses to defendants' discovery demands are due on or before March 12, 2013. To the extent this litigation were to proceed, the parties are confident that they would be able to complete discovery on or before April 19, 2013, as scheduled. Lastly, no issues have arisen between the parties for which we feel Court intervention is necessary at this time nor do we contemplate any future issues aside from those raised in plaintiff's March 4, 2013 letter to the Court to be resolved at the upcoming status conference.

Thank you for your consideration herein.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "BRIAN FRANCOLLA".

Brian Francolla  
Senior Counsel  
Special Federal Litigation Division

cc: Gabriel Harvis, Esq. (By ECF)  
Harvis, Wright, Saleem & Fett, LLP  
Attorney for Plaintiff  
305 Broadway, 14<sup>th</sup> Floor  
New York, New York 10007